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Attorneys for Plaintiff MEDIATEK INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

MEDIATEK INC.

Plaintiff,

V.

FREESCALE SEMICONDUCTOR, INC.

Defendant.

**Civil Action No. 4:11-cv-05341 (YGR)
(JSC)**

**DECLARATION OF
MH SHIEH IN SUPPORT OF
FREESCALE SEMICONDUCTOR
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL**

DEMAND FOR JURY TRIAL

1 I, MH Shieh, declare as follows:

2 I am an employee of MediaTek Inc. ("MediaTek"), plaintiff in the above-captioned
3 matter. My current job title is Special Assistant to the General Manager. I submit this
4 declaration in support of Freescale Semiconductor Inc.'s ("Freescale") Administrative Motion to
5 File Under Seal Freescale's Letter Brief Regarding 30(b)(6) Testimony on Prior Art
6 ("Administrative Motion") pursuant to Local Rules 7-11 and 79-5. I have personal knowledge of
7 the facts set forth in this declaration and, if called to testify as a witness, could and would do so
8 competently.

9 1. Freescale's Administrative Motion seeks to have filed under seal confidential,
10 unredacted versions of Freescale's Letter Brief Regarding 30(b)(6) Testimony on Prior Art
11 ("Freescale's Letter Brief") and Exhibits 2, 3, and 4 to Freescale's Letter Brief. Freescale's
12 Letter Brief and Exhibits 2, 3, and 4 contain deposition testimony concerning MediaTek's legal
13 analysis and evaluation of the patents-in-suit.

14 2. MediaTek does not publicly disclose information concerning its analysis and
15 evaluation of its intellectual property, including the patents-in-suit. Instead, MediaTek protects
16 this information as a trade secret, and takes steps to ensure that this information remains
17 confidential, including marking the information included as Freescale's Letter Brief and Exhibits
18 2, 3, and 4 as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" when MediaTek
19 produced this information in this action. If this information were publicly disclosed, MediaTek's
20 competitors could use the information in Freescale's Letter Brief and Exhibits 2, 3, and 4 to
21 MediaTek's economic disadvantage by designing products based on MediaTek's evaluations of
22 its intellectual property.

23 3. The requested relief is narrowly tailored to protect the confidentiality of this
24 information. Only those portions of Freescale's Letter Brief and Exhibits 2, 3, and 4 that
25 describe the MediaTek's analysis of its intellectual property are covered by Freescale's
26 Administrative Motion.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

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4 Dated: September 6, 2013
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7 MH Shieh
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